

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MADHURI TRIVEDI,
Plaintiff

v.

GENERAL ELECTRIC COMPANY; GE
HEALTHCARE; LARRY CULP, CEO OF
GE IN HIS INDIVIDUAL AND
OFFICIAL CAPACITY; GE BOARD OF
DIRECTORS; FRAGOMEN, DEL REY,
BERNSEN & LOEWY, LLP; JENNY
SCHRAGER, PARTNER AT
FRAGOMEN, DEL REY, BERNSEN &
LOWEY, LLP, IN HER INDIVIDUAL
AND OFFICIAL CAPACITY; MIKE
SWINFORD, FORMER CEO OF GEHC
SERVICES IN HIS OFFICIAL AND
INDIVIDUAL CAPACITY; CARL
CONRATH, SENIOR ENGINEERING
MANAGER OF GE HEALTHCARE IN
HIS OFFICIAL AND INDIVIDUAL
CAPACITY; AND FOLEY &
MANSFIELD LAW FIRM

Defendants

NO. 1:19-CV-11862-PBS

**DEFENDANT FOLEY & MANSFIELD LAW FIRM'S
MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant, Foley & Mansfield Law Firm ("F&M"), respectfully asks this Court to extend the time for it to respond to the Complaint from **October 1, 2019** to **October 15, 2019**. This extension will allow its legal counsel adequate time to review and respond to the Complaint. In support of this motion, F&M states:

1. The Complaint filed in this action is over 188 pages, includes 34 exhibits, and asserts at least fifteen counts against nine defendants. The Plaintiff appears to allege that F&M

committed legal malpractice by, *inter alia*, failing to bring and/or pursue various statutory claims against General Electric after F&M sent a letter from its office in Minneapolis, Minnesota on July 16, 2014 to General Electric Healthcare in Wauwatosa, Wisconsin.

2. F&M does not have an office, or do business in, the Commonwealth of Massachusetts and was therefore unable to retain counsel to defend it until September 23, 2019.

3. Because of the length and scope of the Complaint, along with the time and location in which the alleged legal malpractice occurred, undersigned counsel requires additional time to assess and appropriately respond to the Complaint

4. No party will be prejudiced by extending the current response deadline by fourteen (14) days. In fact, allowing counsel additional time to assess and respond to the Complaint will only serve the interests of justice.

5. The Plaintiff will not assent to extending this deadline to **October 15, 2019**.

WHEREFORE, the Defendant, Foley & Mansfield Law Firm, respectfully asks this Court to extend the time by which they must respond to the Complaint to **October 15, 2019**.

Defendants,
Foley & Mansfield Law Firm,
By its attorneys,

/s/ William R. Covino
Susan E. Cohen BBO#553353
William R. Covino, BBO#673474
Susan M. Silva, BBO#694176
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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that he reached out to the Plaintiff via telephone on September 25 and 26, 2019, but was unable to reach her. On September 27, 2019, counsel conferred with the Plaintiff via email, who was agreeable to extending the deadline for F&W to respond to the Complaint, but the Plaintiff was not agreeable to a two-week extension.

/s/ William R. Covino
William R. Covino, Esq.

CERTIFICATE OF SERVICE

I, William R. Covino, hereby certify that I have this 27th day of September 2019, I served a copy of the foregoing document, by causing a copy thereof, to be sent electronically, through the ECF system, to the registered participants in this case, as identified on the Notice of Electronic Filing (NEF).

/s/ William R. Covino
William R. Covino

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